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July 20, 2022

Hon. Andrew L. Carter, Jr.  
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Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 435  
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T. ROBERT ZOCHOWSKI, JR.\*NOT ADMITTED TO THE NEW YORK BAR  
\*\*ADMITTED ONLY TO THE CALIFORNIA BARRe: *In re Invictus Global Management, LLC*, Case No. 22-mc-00130 (S.D.N.Y.)  
Third Joint Request to Extend Discovery Deadlines

Dear Judge Carter:

Pursuant to this Court's Individual Rule 1(D), we are writing on behalf of Respondents Apollo Global Management, Inc. and Marc Rowan and, with its counsel's consent, Petitioner Invictus Global Management, LLC, to ask the Court for an extension of time as set out below.

Petitioner filed this 28 U.S.C. § 1782 proceeding on May 6, 2022 (ECF No. 1). On May 9, before this matter was assigned to Your Honor, Judge Preska entered an *ex parte* order (ECF No. 11) authorizing discovery under that provision, directing Petitioner to serve that order on Respondents, and directing Respondents to comply with the subpoenas accompanying Petitioner's petition by June 8. Petitioner effected service on Apollo on May 13, and on Mr. Rowan (through counsel) on May 31.

On May 31, the parties met and conferred, and agreed to extend the time for Respondents to make a motion to quash Petitioner's subpoenas, if any, by June 24. Respondents filed their first joint letter requesting an extension for time to file a motion to quash Petitioner's subpoenas on June 3. (ECF No. 13.) The parties thereafter requested another extension of time while their discovery negotiations continued (ECF No. 17), and the Court endorsed the parties' proposed amended schedule, extending Respondents' deadline until July 22. (ECF No. 18.)

The parties' discovery negotiations are still ongoing as of this time. As a result, the parties believe that another extension of Respondents' deadline is appropriate, and would further facilitate the parties' efforts. To that end, the parties now request that the Court endorse the following amended schedule: (i) any party shall have until August 12, 2022 to file a motion to quash, if any; (ii) Petitioner shall have until August 26, 2022 to file its opposition to any such motion; and (iii) any moving party shall have until September 9, 2022 to file a reply submission, if any. The parties also intend for the time being to defer any depositions as their negotiations continue.

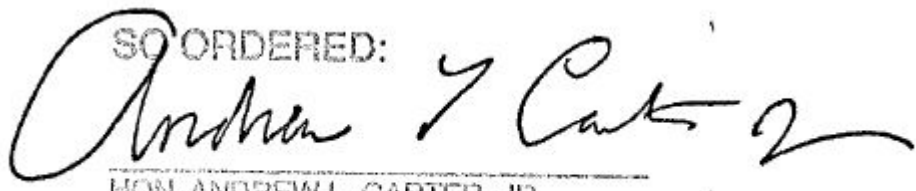
This letter constitutes the parties' third joint request for an extension to discovery deadlines. This new requested extension will not affect any other dates in this matter.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Andrew J. Ehrlich  
Andrew J. Ehrlich

cc: All Counsel of Record (via ECF)

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE  
Dated: 7/21/2022